

JAP:TJS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M-10-1377

- - - - -X

UNITED STATES OF AMERICA

- against -

BOWLAH JAGESSAR,

Defendant.

AFFIDAVIT IN SUPPORT OF
REMOVAL TO THE DISTRICT
OF SOUTH CAROLINA

(Fed. R. Crim. P. 5(c))

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

JOSEPH GRIMALDI, being duly sworn, deposes and says that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about September 28, 2010, an arrest warrant was issued by the United States District Court for the District of South Carolina, commanding the arrest of the defendant BOWLAH JAGESSAR for Conspiracy Relating to Fraudulent Identification Documents, contrary to Title 18 United States Code, Section 1028(f).

The source of your deponent's information and the grounds for his belief are as follows:

1. On or about September 28, an arrest warrant was issued by the United States District Court for the District of South Carolina, commanding the arrest of the defendant BOWLAH JAGESSAR pursuant to an indictment for Conspiracy Relating to Fraudulent Identification Documents, contrary to Title 18 United States Code, Section 1028(f). A copy of the arrest warrant and

indictment are attached hereto.


2. On or about October 18, 2010, HSI agents in the New York field office received a request from the HSI field office in Charleston, South Carolina. The request sought the arrest of individuals in connection with the attached indictment and included warrants for their arrests. One of those individuals was the defendant BOWLAH JAGESSAR.

3. Agents located in South Carolina also provided a picture of JAGESSAR and an address at which the South Carolina agents believed JAGESSAR to be located. The address provided was 114-11 James Court, Jamaica, New York.

4. On November 18, 2010 at approximately 6:00 a.m., agents knocked on the door of 114-11 James Court. The defendant BOWLAH JAGESSAR answered without opening the door. I identified myself. The JAGESSAR then asked if we had a warrant. I indicated that we did. A woman JAGESSAR later identified as his wife opened the door. Agents then entered the house and arrested JAGESSAR.

5. Agents then allowed JAGESSAR to retrieve clothing and his identification. The identification he retrieved were an expired North Carolina driver's license, an expired New York State learner's permit, and a Trinidadian passport all in the name BOWLAH JAGESSAR. I further compared the photograph provided by South Carolina agents and confirmed that the defendant was the individual sought by the District of South Carolina.

WHEREFORE, it is requested that the defendant BOWLAH JAGESSAR be removed to the District of South Carolina so that he may be dealt with according to law.



Joseph Grimaldi
Immigration and Customs
Enforcement

Sworn to before me this
18th day of November, 2010

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IN THE DISTRICT COURT OF THE UNITED STATES
DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

RECEIVED

UNITED STATES OF AMERICA

vs.

KENNETH MITCHELL,
SHERAZ MAHOMED,
VERONICA RAGBIR,
NICHOLAS RAGBIR,
SHERWIN DURHAM,
BOWLAH JAGESSAR,
BISSOONDIAL RAGOONANAN,
SABRINA LUTCHMAN,
ANDREW ABERDEEN, and
JASON CAMPBELL

) CRIMINAL NO.: 4:10-938 SEP 28 2010
) 18 U.S.C. § 1028(f) LARRY W. PROPPS, CLERK
) FLORENCE, SC

INDICTMENT

COUNT 1

THE GRAND JURY CHARGES:

1. That from in or about February 2009, to in or about December 2009, the exact dates being unknown to the Grand Jury, the defendants, **KENNETH MITCHELL, SHERAZ MAHOMED, VERONICA RAGBIR, NICHOLAS RAGBIR, SHERWIN DURHAM, BOWLAH JAGESSAR, BISSOONDIAL RAGOONANAN, SABRINA LUTCHMAN, ANDREW ABERDEEN, and JASON CAMPBELL**, knowingly, willfully, and unlawfully did combine, conspire, confederate, and agree together and with each other:

- a. To produce identification documents in violation of Title 18, United States Code, Section 1028(a)(1);
- b. To knowingly transfer identification documents knowing that they had been produced without lawful authority in violation of Title 18, United States Code, Section 1028(a)(2);

- c. To knowingly possess with intent to use unlawfully and transfer unlawfully five or more false identification documents, in violation of Title 18, United States Code, Section 1028(a)(3);
 - d. To knowingly possess false identification documents with the intent that such document be used to defraud the United States in violation of Title 18, United States Code, Section 1028(a)(4);
2. In furtherance of the conspiracy and to affect the objects thereof, the defendants, committed, among others, the following overt acts in the District of South Carolina, and elsewhere:
- A. On or about February 26, 2009, **KENNETH MITCHELL** sold a counterfeit social security card and a United States Virgin Islands Birth Certificate to **JASON CAMPBELL** which he then used to obtain a genuine South Carolina drivers license from the Department of Motor Vehicles.
 - B. On or about August 3, 2009, **ANDREW ABERDEEN** obtained a genuine South Carolina drivers license from the Department of Motor Vehicles using a counterfeit United States Virgin Islands drivers license.
 - C. On or about September 7, 2009, **KENNETH MITCHELL** sold a counterfeit social security card and United States Virgin Islands Birth Certificate to **SABRINA LUTCHMAN** which she then used to obtain a genuine South Carolina drivers license from the Department of Motor Vehicles;
 - D. On or about September 10, 2009, **KENNETH MITCHELL** sold a counterfeit social security card and United States Virgin Islands Birth Certificate to **SHERWIN DURHAM** which he then used to obtain a genuine South Carolina drivers license from the Department of Motor Vehicles;

- E. On or about November 30, 2009, **KENNETH MITCHELL** sold a counterfeit social security card and United States Virgin Islands Birth Certificate to **BOWLAH JAGESSAR** which he then used to obtain a genuine South Carolina drivers license from the Department of Motor Vehicles;
- F. On or about December 7, 2009, **KENNETH MITCHELL** sold a counterfeit social security card and United States Virgin Islands Birth Certificate to **BISSOONDIAL RAGOONANAN** which he then used to obtain a genuine South Carolina drivers license from the Department of Motor Vehicles;
- G. On or about December, 21, 2009, **KENNETH MITCHELL** sold a counterfeit North Carolina Birth Certificate, and a counterfeit Social Security Card to **SHERAZ MAHOMED** who then used the documents in an attempt to obtain a genuine South Carolina drivers license from the Department of Motor Vehicles;
- H. On or about December 21, 2009, **KENNETH MITCHELL** sold a counterfeit United States Virgin Islands drivers license, a counterfeit United States Virgin Islands Birth Certificate and a counterfeit Social Security Card to **VERONICA RAGBIR** who then used the documents in an attempt to obtain a genuine South Carolina drivers license from the Department of Motor Vehicles;
- I. On or about December 21, 2009, **KENNETH MITCHELL** sold a counterfeit United States Virgin Islands drivers license, a counterfeit United States Virgin Islands Birth Certificate, and a counterfeit Social Security Card to **NICHOLAS RAGBIR** who then used the documents in an attempt to obtain a genuine South Carolina drivers license from the Department of Motor Vehicles;

All in violation of Title 18, United States Code, Section 1028(f).

A True BILL

~~FOREPERSON~~

WILLIAM N. NETTLES (WED)
UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT

for the

District of South Carolina

United States of America

v.

BOWLAH JAGESSAR

Defendant

Case No. 4:10cr938

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) BOWLAH JAGESSAR

who is accused of an offense or violation based on the following document filed with the court:

- ☒ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☐ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

Title 18, United States Code, Section 1028(f)

Date: 09/28/2010



s/Sharon Welch Meyer

Deputy Clerk *Issuing officer's signature*

City and state: Florence, SC

Larry W. Propes, Clerk

Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title

**This second page contains personal identifiers provided for law-enforcement use only
and therefore should not be filed in court with the executed warrant unless under seal.**

(Not for Public Disclosure)

Name of defendant/offender: _____

Known aliases: _____

Last known residence: _____

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: _____

Social Security number: _____

Height: _____ Weight: _____

Sex: _____ Race: _____

Hair: _____ Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates (*name, relation, address, phone number*): _____

FBI number: _____

Complete description of auto: _____

Investigative agency and address: _____

Name and telephone numbers (office and cell) of pretrial services or probation officer (*if applicable*): _____

Date of last contact with pretrial services or probation officer (*if applicable*): _____

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